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(Mich. P78981 / D.C. 90015616)

2 **FOUNDATION FOR INDIVIDUAL  
RIGHTS AND EXPRESSION**

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11 JAMES M. JELLISON, ESQ. #012763

12 *Attorney for Defendants City of Surprise, Skip Hall and Steven Shernicoff*

13 **IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA**

14 Rebekah Massie,

15 No. 2:24-cv-02276-ROS--DMF

16 Plaintiff,

17 v.

18 City of Surprise, a municipal corporation  
and a governmental entity; Skip Hall, in his  
individual capacity; and Steven Shernicoff,  
in his individual capacity,

19 **STIPULATED MOTION TO  
EXTEND TIME TO RESPOND TO  
DEFENDANTS' PARTIAL MOTION  
TO DISMISS PLAINTIFF'S SECOND  
AMENDED COMPLAINT FOR  
CIVIL-RIGHTS VIOLATIONS**

20 Defendants.

21 Plaintiff Rebekah Massie and Defendants City of Surprise, a municipal corporation  
and a government entity, Skip Hall, in his individual capacity, and Steven Shernicoff, in

1 his individual capacity, by and through undersigned counsel, hereby file this stipulated  
2 motion for a modification of Plaintiff's time to respond to Defendants' Partial Motion to  
3 Dismiss Plaintiff's Second Amended Complaint for Civil-Rights Violations (Doc. 34).

4 Plaintiff filed her Second Amended Complaint on April 22, 2025, and Defendants  
5 responded with their Partial Motion to Dismiss on May 27, 2025 (Docs. 32, 34). There are  
6 no previous motions concerning the deadline for which this extension is sought.

7 To allow Plaintiff sufficient time to prepare her response due to counsel's current  
8 travel abroad, the parties have conferred and request the Court set the following deadline:

9 Plaintiff's deadline to respond to Defendants' Partial Motion to Dismiss Plaintiff's  
10 Second Amended Complaint for Civil-Rights Violations: **June 24, 2025.**

11 This Motion is made for good cause, in good faith, and not for the purpose of undue  
12 delay. A proposed form of Order is filed alongside this stipulation.

13 Dated: June 5, 2025

Respectfully submitted,

14 /s/ Adam B. Steinbaugh  
15 Adam B. Steinbaugh\*  
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13 By: s/ James M. Jellison<sup>†</sup>  
14 James M. Jellison, Esq. (012763)

15 *Attorney for Defendants City of Surprise, Skip*  
16 *Hall and Steven Shernicoff*

17 <sup>†</sup> Signed by Adam Steinbaugh with permission.

1 **CERTIFICATE OF SERVICE**

2 I certify that a true and exact copy of the foregoing document has been served  
3 upon the counsel for the parties in interest by operation of the Court's electronic case  
4 filing system.

5 /s/ Adam B. Steinbaugh  
6 Adam B. Steinbaugh  
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